But what this would mean is that they have then the data requirements, the data elements, the business interface specifications created. This is not for this session going to be the electronic interface specifications.

When you look at what we have done with ordering work, this is where there has been a tremendous amount of work across the committee. We are going to divide this into a couple different slides to talk about this.

Their first issue was in May of '95, and in the area of resale, ordering for resale services they have put several issues into final closure. When we talk about the different local service request forms that Glen was showing, the Version 1 forms would give you the basis for basic resale ordering. The Version 2 forms bring in some other features such as the ISDN.

Centrex, you will notice here, just went to initial closure in April.

What you get from these forms that the OBF has created is the data requirements, the usage rules about when and how to exchange data, what you need to do with the other companies. That gives you the forms in the binder Glen was holding up. That would allow you to do ordering in a paper format in a manual environment. Okay, that does not get you to automated.

When you talk about what the EDI committee is

doing, as Glen mentioned, with their Version 7.0 and 7.1, that is where they have done the data formatting for local service ordering, and that gets you to where you can do some electronic exchange between companies.

There is close working going on between members in the OBM and the EDI, as Glen mentioned, to make sure the work gets interpreted with a clean pass the first time through, if we can.

Other ordering work on unbundled network elements. Again, there is some work done early in the Version 1 that talks about loops. There is some other work going on with ports that comes into Version 2, and there are open issues still involving loop. Again, these are for the forms. When you see SR version and the data formats, the EDI version.

Aside from unbundling and the resale, this committee has also dealt with directory listing requirements, how to order directory listing requirements. And this information has been encaptured with the local service request Version 2, and is targeted -- it's not completed yet by EDI, but is targeted for their Version 7.1.

It is also important to notice that interconnection trunks are being handled versus the ASR, the access servicer request forms. For access service request the OBF does the information forms, as Glen showed you, for the basic information. We also do the data formatting

through a subcommittee. So that is not then farmed out to another group or liaisoned with another group, but that is actually handled by the committee at OBF.

They have also worked on a number of portability issues with interim and long term, completed both of those in different versions, respectively.

Along with ordering, one important feature is the customer account record exchange or the CARE exchange of information, and Glen will talk about this one.

MR. SIRLES: We did think it was important as we talked about ordering to point out that ordering is broader than just the local service request. It's broader than resale. It's broader than unbundled network elements.

Some of the first things that we did deal with in the forum was the primary inter-exchange carrier process, or the PIC change process. That process is handled by an industry standard interface known as the Customer Account Record Exchange, and that document had to be modified to accommodate the PIC change process in an unbundled and resold environment.

We feel that the Subscription Committee has established the foundation that accomplishes that in the local competition environment. The first issue was accepted in July of '95, and all of the changes that have been completed to date, which do establish a good foundation for

that are included in the revisions to Issue 8 of the CARE document, which have been released throughout '96 and into '97.

The topics covered include the responsibilities to notify inter-exchange carriers of end user moves, and the information exchanged on resold lines. To highlight a few of these for you, essentially the incumbent, LEC, has a role in the migration to another facility's base provider, and that role is to provide the inter-exchange carrier who is serving that end user information about that migration and the fact that the end user has changed facility-based providers.

Within the resold environment, such things as whether or not to include information on list service products from the incumbent LEC related to resold lines was discussed and resolved.

Other areas that examined the switch provider's role in the PIC change process for a resold line have been discussed and resolved.

Now, I want to hook back, since we are trying to follow the order that the Commission has laid out here, we put CARE within ordering because it's important to realize that that is part of the ordering process. But we did want to move on down the agenda into provisioning. However, you must realize this hooks back to the local service request

form. Because as we talk about provisioning, we are talking about a firm order confirmation, a delay notice, a completion notice, and an error ID. These are the issues that have been identified within provisioning that the OBF has dealt with. We have placed one of those into final closure. That's the firm order note confirmation. It was closed October of '96. It was included in our LSR Version 1 and EDI Release Version 7.

The other three areas are still open and currently being discussed by the OBF. It's important to note, as Dianne mentioned earlier, that we did tackle ordering first. We put pre-order and we put provisioning behind ordering in the order of importance. And so while these issues are active and we're getting to them, we have concentrated more on ordering in the local service request than we have on these areas. However, we're getting there.

MS. MOORE: As it turns out, the same committee within our structure works all three of those areas, so they have had to work with juggling and prioritization quite heavily.

In the billing area, there is two components we want to talk about, we have done work with. One is the end user billing and one is the carrier-to-carrier billing. The data exchange between the companies and end user billing is critical to make sure that a competitive local exchange

carrier coming into the marketplace gets information sufficient for it to be able to bill its customers and collect its revenues. That's always near and dear to our hearts.

So, we are dealing here with how you need to aggregate the information between carriers. You are going to see some acronym type things such as Revenue Accounting Office, RAO, but that is a basic structural component of the usage record exchanges that help the companies identify what they have and how to handle it within their systems.

So we had to go through for the incumbent local exchange carriers, the competitive local exchange carriers, how to pass the information in a manner that could be recognized and then match the correct end user customer account.

They have also worked with a number of portability in this committee, this session, that impacts them quite a bit. And guidelines for when NPA-NXX is shared in the resale environment, other needs for how to handle more company codes as they need to, port a number of information, and things of that nature.

There is still work being done in this committee. Current work includes working on some message processing requirements for resale, some database queries, the number of portabilities so we can make sure we are getting the

right information here, and some billing validation database and automated message accounting support, again in the number of portability arena.

In the billing arena for carrier-to-carrier billing, there have been several issues and a lot of pre-work has been done here, a lot of work has been done here that's gone to actual final closure. Again, this is one of the areas where we are being proactive in trying to get certain things set in place for exchange of information between companies without having all this happening at this point. I mean, no bill has actually occurred, and we recognize that -- or some of these services -- and we recognize that when it happens we probably need to rework some of this when we get to the details and see how it physically is going to work. We have anticipated how things might work and come up with these resolutions.

The billing side and the LEC-to-LEC billing, we have dealt with things such as the interconnection point billing, which is an important way of getting a facility's base competitive local exchange carrier to be able to get information with the incumbent LEC when they are having a facility that's involved in the same service. They again did resale issues, and unbundled element issues.

They have got most of these to final closure. You notice the long-term local number portability just went to

initial closure in April. So we will go to final closure in the August time frame. They are still working with the local switching and unbundled elements issues.

Again, the structure that we have here is that you see they closed at OBF. This is your final closure date. Remember, I said you can start implementation work at the initial closure date with pretty safe assurance that that's going to be your resolution.

Within the Billing Committee there is a formal tie to the Bell Corp. Technical Review Group that works in the Carrier Access Billing System, the CAB system, and those groups have been working very expeditiously and parallel to move these things to a data format standard so you can do this electronically and exchange of this information.

We have referenced here which CABS version numbers. There are two CABS versions a year, which CABS version numbers were mapped to the OBF issues, so you can tell when you would be able to get this electronically.

Now, realize that there were other billing formats discussed in the committee besides CABS. We only had the formal liaison with that group. It's expected that if a company used a different billing system, that the requirements, the data and business requirements and resolutions would still need to be accommodated to whatever billing system is being used.

MR. SIRLES: In conclusion, we realize we presented you with a lot of information this morning, much of which you probably couldn't see from the back of the room, so hopefully you will be able to see it later on. What we wanted to show you were several things. The industry guideline development process is an evolutionary one. We have been working on this since '95. Steam has picked up throughout the process. We are moving at a very rapid pace now through as many issues as we can possibly turn out.

We do think significant work has been done in establishing a foundation for the OSS guidelines. Virtually everything the OBF deals with does relate directly to OSS. The committees have been and are continuing to work at an accelerated pace. We have changed many of our basic rules to allow not only committees to work faster, but to work smarter. We have established the liaisons that are necessary to have the interdependencies between the forums so that we can move the work along as quickly as possible.

We do feel and understand that we have a responsibility to the industry to move quickly, yet be thorough because if we are not thorough we don't turn out a usable product, and we all end up with rework, which is what we are trying to protect and prevent.

We take our job very seriously at the OBF. We do

feel we provide a valuable service. We have been providing it for years. We feel we are right in the middle of everything that needs to be dealt with now in terms of issues, and very proud of the job that we are doing.

If any of you out there are not part of this process and as a result of our comments feel you ought to be, please talk to us because there is room for you and we need your opinions and we need your thought. If you need additional information on what we have presented here this morning, ATIS does have a Web site you can contact, www.atis.org. You will find information on all the ATIS committees. You will find very detailed information on the ordering and billing forum, as well as all of our issues and resolution statements, and all of our documents. So, please use the Web site or contact any of us.

We have a few minutes. If anyone has any questions of a general nature, we will be happy to take those. If not, we thank you very much.

(Applause.)

MR. WELCH: That's concludes the first portion of the program. I want to thank the folks from ATIS for coming. Susan, Glen, Dianne, thank you very much for coming to Washington and giving us that presentation.

We will get started with the first panel at 10:00, so we will take a short break for 10 minutes, and we will

get started right at 10:00. If I could ask the panelists on the first panel please to gather up front here in the next couple of minutes, that would be helpful.

(Whereupon, a recess was taken.)

MR. WELCH: The next panel will be focusing on the critical elements of access to OSS function. We have a distinguished group of panelists here. I will introduce them from left to right.

First, over here on the far left is Anne Bingaman. Anne is with LCI. She is Senior Vice President for the Local Telecommunications Division. Seated next to Anne is Don Lunch. Don is with MCI, a lot of "CI's" here on the panel. Don is Senior Vice President of Finance and Local Markets at MCI. Sitting next to Don is Kevin Snyder. Kevin is with GTE where he is Assistant Vice President and Process Team leader, and we are glad to have him here today. Sitting next to Kevin is John Lenahan, from Ameritech. John is Assistant General Counsel at Ameritech. Seated next to John is Commissioner Vince Majkowski from the Colorado Commission. We welcome him today. Seated next to Commissioner Majkowski is Katheryn Brown from NTIA, the National Telecommunications and Information Administration. And seated next to Katheryn on the far end on the right is Don Russell from the Department of Justice. Don is head of the Telecom Division.

We will follow the standard format for this panel and all the panels where each panelist will deliver some brief opening remarks. We ask that each one of the panelists try to confine that to roughly three minutes because we have, obviously, a lot of ground to cover here. And if you would please keep your eye on Susan, the timekeeper here, she will let you know when the time is getting ready to expire.

So I suggest that we go from left to right, and why don't we start with Anne Bingaman. Anne, please.

MS. BINGAMAN: Okay. Thank you very much, Richard. It is an honor to be here today, and think the Commission has done an outstanding thing convening these forums.

I think my message is that this is a start. It is an excellent start. The Commission needs to involve itself heavily in performance standards and set those performance standards to help the industry, help consumers, help competition, and get this thing off the ground and blasting forward as Congress intended, and I think we all want.

I would say just a few things really. In the resale environment there is not a -- ILEC I am aware of, and an incumbent LEC, which has adequate OSS to meet resale. And I say that as a company which is dealing with four incumbent LECs right now, trying to deal with a fifth, Bell

Atlantic. We have six months of experience under our belt, a big back office. There are problems in billing, usage, USOC codes, free-from CRSs, CSRs, with Ameritech. We have problems with PacBell with dropped orders. They can only get to 5,000 by the end of fourth quarter '97, 5,000 orders a day, they have told us. Bell Atlantic has refused to sign a resale agreement with us, seeking a confidentiality order for all OSS performance standards, so that anything we told you or the Department of justice would have to be under seal. I have refused to do that.

There is statistics I could give you briefly. There are reams of statistics on these kinds of things. But to give you a little bit of feel for -- on just one measure. Orders pending, waiting notice of a due date, in PacBell we have LCI of late last week had 21 orders pending, two for one to three days; one, four to five days; four, six to 10 days; five, 11 to 15 days; and nine orders, 15 days and over.

Ameritech, 21 orders one to three days; 22, four to five days; six, six to 10 days. Bell South, 93 orders pending waiting for an installment date; 13, one to three days; 26, four to five days; four, six to 10 days; 45, 11 to 15.

This is to give you an idea, OSS and the simplest issues is not there for any of these RBOCs, and I impugn no

bad faith whatsoever in this. It is a matter of complexity. This is something people have not done before. And the problem is we need the Commission to step and set performance standards.

The resale environment is one thing. The all-important UNE or network platform environment upon which so much of the Commission's policy decisions, its access charge orders depends is basically nonexistent. LCI has worked this winter to try to negotiate moving sales offices and then customers to the UNE environment. NYNEX, we met with March 28th, and they told us, frankly, first, it was going to be more expensive than resale; and, second, well, gee, it would be good cause they hadn't done this with anybody and they need to work the bugs out. and we said, "Great, we will be glad to do it." So the test is ongoing with NYNEX. It's a matter of two months old, but it is in its infancy, and in no way scaleable to commercial operations.

Ameritech, we exchanged -- have had several meetings, exchanged letters with, a strong desire to get the UNE platform there because fully half of our business is in the Ameritech region. We need to be able to complete through the platform in the Ameritech region.

I thought we were posturing for litigation, frankly. I had gotten quite discouraged, long series of letters back and forth with us and their lawyers, and

meetings and people saying they didn't understand. And then the sun broke last Thursday when Neil Cox took the initiative to set up a meeting, to come to town and see me.

And I said to him very straight, "Neil, I am very happy about this." I said, "They profess not to know what we want."

He said, "No, no, no. We know what you want. We're doing it with AT&T. The problem is we only have one engineering team. We can't conduct more than one test at once."

And I said, " Well, let us participate in that test then, because we need the experience. We are trying to get the back office experience to do this."

Bell South -- Bell Atlantic, we don't have an agreement with for the reasons I've stated, refusal to sign this onerous confidentiality order, but PacBell and Bell South have had workshops in the last two months, and it's pretty clear they are brand new to this.

So the message from here is the Commission is doing the right things focusing on this. You are fulfilling your historic responsibilities. We need you. The industry needs you. The ILECs needs you. The CLECs and the consuming public, to get in and set the performance standards that will drive this and make it work.

MR. WELCH: Thanks, Anne.

To continue the baseball metaphor, I guess you are asking the FCC to step up to the plate here.

Don Lynch from MCI.

MR. LYNCH: And we will do as well.

Good morning. I am Don Lynch, Senior Vice President of local service operations for MCI. I am pleased to be here today to have the opportunity to share with you some of MCI's concerns as we work to bring competition to local telephone service.

As you know, MCI is committed to become a major competitive player in the local markets. We are spending great sums of money, $1.7 billion this year -- through this year, to bring on local facilities. But our strategy also includes the use of resale and unbundled network elements. In those elements that we lease or buy from local encumbrance must function seamlessly with our own network to ensure that our customers receive the kind of quality and service that they have come to expect from MCI.

That is why Operation Support Systems are critically important to our efforts. OSS consists of all the computerized and automated systems, together with the associated business processes that ensure carriers can satisfy customer needs and expectations.

If OSS systems do not work and interact properly, customers can lose service completely, lose features,

receive inaccurate bills, and in some cases even multiple bills.

Unfortunately, in many local markets we are encountering non-operational support systems at worst, or barely operational support systems at best. The incumbent local exchange carriers have developed OSS systems that adequately serve their own customers but fail to work with ours for a number of reasons.

The OSS systems the ILEC provide are not robust. They often fail to meet company standards or have any adequate performance measurements associated with them. They cannot accommodate high volume commercial use for all functions.

For an example, Ameritech systems focus primarily on resale, plain old telephone service pots. There is little proof that Ameritech can successfully process orders for ISDN, private lines, Centrex unbundled network elements, or frame relay.

In addition, the use of proprietary interfaces by ILEC serves as a barrier to entry by driving up costs and impeding efficiency. The use of proprietary interfaces require CLEC to develop multiple interfaces for different ILEC to train the representatives on multiple interfaces, and then we are forced to establish the ability to switch between these multiple interfaces.

Moreover, ILEC claims of the readiness of their OSS is based upon their view that technical readiness equals operational readiness. Those claims are also based upon the view that readiness for one function translates to readiness for other functions.

As a customer service VP for PacBell recently explained, you can do all the testing that you want, but the theoretical world does not translate one for one into the real world. Many difficult problems are encountered that cannot be accounted for ahead of time.

Worse yet, there are no recognized measures -- there is no recognized method of measuring OSS performance day to day how are we doing.

When MCI buys a product from other vendors, let's use switches for example, we expect those products to work to a certain standard agreed upon with the manufacturer. If the switches fail to meet those standards, MCI can take its business elsewhere. As monopoly providers, vendors, the ILECs have been able to resist negotiating performance standards.

The Local Competitors Users Group, LCUG, has developed standards to measure quality. The ILEC should conform to those standards across all business processes within enforceable penalties if they fail to meet those standards.

Another critical concern is that systems must be capable of processing large volumes or orders, transactions. Problems with PacBell's OSS have grown in tandem with the volume of orders. As a result, both MCI and ATT have had to scale back their market entry plans in the State of California.

Customers deserve the ability to choose local carriers and to change those carriers in a simple, transparent way. They should not lose dial tone, directory assistant listings, or get features they don't want just because the LEC systems are in adequate. Most importantly, local competition cannot flourish without adequate OSS systems. The LEC must be compelled to build and maintain systems that have sufficient capacity and provide parity to all competitors. Only then can consumers -- only then are consumers certain to receive the benefits of real competition, better products, and service at lower price.

Thank you.

MR. WELCH: Thank you, Don.

Next, we will hear from Kevin Snyder of GTE. Kevin?

MR. SNYDER: Good morning. I have been involved at GTE in helping to coordinate GTE's compliance to the order. Last August the FCC issued its interconnection order which required the incumbent local exchange companies to provide

competitive local exchange companies with nondiscriminatory access to their operation support systems.

GTE moved rapidly after receiving the FCC order to fulfill our legal and our business requirements and put in place the capability to receive and process orders from the CLIC on January 1, 1997.

We continue to enhance our OSS capabilities for a number of reasons: One, to improve our internal productivity; second, to address expected increases in order volumes; to adopt the national standards; and to serve the needs of our new business customers.

To respond to the FCC order, GTE developed the S Secure Integrated Gateway System, or SIGS, which allows two-way electronic communication between the CLEC and GTE's data processing systems. By using SIGS, CLICs have access to the same information and on the same basis as do our own retail representatives.

The SIGS application makes doing business with GTE easy and inexpensive. All that is required by the CLEC is a personal computer, a WEB browsers, and a digital certification for security purposes. SIGS addresses all the pre-ordering repair functions ordered by the FCC.

For orienting and provisioning processes, GTE utilizes an existing data transmission method widely used within the telecom industry. GTE utilizes Network Data

Mover, or NDM, to allow CLEC to electronically submit orders to GTE and for us to electronically communicate back any errors or jeopardies and also service activation information.

Later in the year, GTE will incorporate ordering and provisioning into our SIGS platform, utilizing the EDI Version 7 release.

Systems and electronic processes are only part of the puzzle. We also moved quickly in '96 to open the National Open Market Center to process CLEC orders. We also revisited procedures and trained all impacted front-line personnel on the new wholesale activity. We have conducted workshops, four of them, across the United States, with over 200 participants representing 60 CLECs. We have also conducted one-on-one meetings and demonstrations of SIGS with CLECS upon request. Currently we have five CLECs using the SIGS platform.

Our operational performance during the start up period has been good. Our statistics show that over 95 percent of the committed due dates are being met, and provisioning intervals at parity with our retail channels.

GTE, like many ILECs, face challenges in developing our OSS capabilities. Among those challenges were the development of new processes, changing old Legacy systems, the lack of industry standards, little or no

forecast of activity, diverse customers with differing needs, and a very short development cycle.

In conclusion, I would like to say that we were ready on January 1st and are ready now to process the orders of the new market entrants. We have developed processes that reflect our corporate philosophy of being easy to do business with. And finally, we continue to move aggressively to provide new enhancements to adjust industry standards and to meet the business needs of our new customers.

Thank you.

MR. WELCH: Thank you, Kevin.

Next, John Lenahan from Ameritech.

MR. LENAHAN; Thank you, Richard.

The purpose of this panel is to answer the question of what is nondiscriminatory access to OSS mean, and I thought I would give you Ameritech's view of what the legal requirements as spelled out in the first report in order, and as supplemented by the second order on reconsideration, set the legal standard, and then briefly describe to you the things that Ameritech has done to meet that standard.

The legal standard is pretty clear. The ILEC has an obligation to provide equivalent access to the electronic OSS information and functions that it provides to itself,

its customers or other carriers. This access must permit the CLEC to perform these functions in substantially the same time and manner that the ILEC performs for itself.

Ideally, the access should be through interfaces that are consistent with national standards, but the FCC is very clear that if national standards don't exist, that compliance is not required. And the ILEC is required to make modifications to its systems to facilitate this access. So that's the legal standard.

What as Ameritech done since the order in 9698 to meet that standard?

Basically, we have done four different things.

First, we have implemented and defined specifications for each of the OSS functions. This has been done through an iterative process. As the presentation demonstrated this morning, it is an evolutionary process. We have published technical specs. We have published user guides. We have published so-called business rules. Like GTE, we have conducted one-on-one training sessions. We have an entire group dedicated to helping the CLEC implement our OSS interfaces. And we have implemented a change in management process in recognition of the fact that the technical and business information that is needed will change, and it needs to be updated.

Most of this documentation is available on our

home page. It's about 4,005 pages of technical specs and user information.

The second thing we have done is ensure that the five OSS interfaces in each of the subfunctions are in fact operationally ready, and we have done this through a series of comprehensive internal testing, carrier-to-carrier testing, and in most cases commercial use, which in the last month or two has increased dramatically. And we believe all of that demonstrates that the CLECs have reasonable assurance of obtaining access to the information or functions that's required at the demand level that they need.

That leads me to the third thing that we have done. We are very conscious of the fact that our interfaces have to be sized to meet the anticipated demand. And we have an internal policy and numerous procedures to forecast anticipated demand, and our position is that we have our -- that our OSSs at any given time have adequate capacity to meet current demand, plus forecasted demand for a six-month period, and we have implemented a process that enables us on an ongoing basis to project demand and stay basically six months ahead of the curve.

The final thing that we have done is implement a series of OSSs measurements and reports to track our performance, and basically we measure three things: cycle

time or response time; reliability or accuracy of the information provided; and availability of the overall system itself.

Most of our major interconnection agreements cover these performance measurements in the contract, and we are clearly committed to tracking and reporting these things on an ongoing basis.

So basically the for things we have done to implement our requirement, we have published the specs. We have ensured that the specs are operational. We have adequate capacity, and we track our performance.

Thank you.

MR. WELCH: Thank you, John.

Next, we will hear from Commissioner Vince Majkowski from Colorado. Commissioner?

COMMISSIONER MAJKOWSKI: Thank you, Richard.

Before I begin, I have got to give the typical disclaimer. The views that I am about to express are my views and do not represent that of the Colorado Commission.

This subject has been very, very fascinating, from the information as to electronic interface versus manual interface. I want to begin by saying since 1995, exactly the 24th of May 1995, Governor Rohmer signed into law House Bill 1335, which directed the Colorado Public Utilities Commission to open up the local loop to competition by 1